

**WHITE & CASE LLP**

J. Christopher Shore  
Philip Abelson  
David Turetsky  
Michele J. Meises  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 819-8200  
Facsimile: (212) 354-8113  
E-mail: cshore@whitecase.com  
philip.abelson@whitecase.com  
david.turetsky@whitecase.com  
michele.meises@whitecase.com

– and –

**WHITE & CASE LLP**

Gregory F. Pesce (admitted *pro hac vice*)  
111 South Wacker Drive, Suite 5100  
Chicago, Illinois 60606  
Telephone: (312) 881-5400  
Facsimile: (312) 881-5450  
E-mail: gregory.pesce@whitecase.com

*Proposed Counsel to the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)

) Case No. 23-10063 (SHL)  
)

) (Jointly Administered)  
)

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**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C § 1746 REGARDING THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR ENTRY OF  
AN ORDER CLARIFYING THE REQUIREMENT TO PROVIDE ACCESS TO  
CONFIDENTIAL OR PRIVILEGED INFORMATION AND APPROVING A  
PROTOCOL REGARDING CREDITOR REQUESTS FOR INFORMATION**

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”), and in accordance with this Court’s case management procedures set forth in the *Order Implementing Certain Notice and Case Management Procedures*, entered on January 27, 2023 [Docket No. 44] (the “**Case Management Order**”), the undersigned hereby certifies as follows:

1. On January 19, 2023, Genesis Global Holdco, LLC and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code. On March 1, 2023, the Official Committee of Unsecured Creditors (the “**Committee**”) filed *The Official Committee of Unsecured Creditors’ Motion for Entry of an Order Clarifying the Requirement to Provide Access to Confidential or Privileged Information and Approving a Protocol Regarding Creditor Requests for Information* [Docket No. 111] (the “**Motion**”).

2. The Committee served the Motion and proposed order approving the Motion (the “**Proposed Order**”) as reflected in the affidavit of service filed at Docket No. 116.

3. Paragraph 40 of the Case Management Order provides that a “request for relief in a Pleading may be granted without a hearing provided that, after the passage of the Objection Deadline, the attorney for the entity who has filed the Pleading (a) files a declaration pursuant to 28 U.S.C. § 1746 indicating that no Objection has been filed or served in accordance with these Case Management Procedures (the “**Certificate of No Objection**”); (b) serves the Certificate of No Objection via e-mail upon the attorneys for the Debtors, the U.S. Trustee, and any Official Committee prior to submission thereof to the Court; and (c) delivers by e-mail to Chambers the proposed order (in Word or WordPerfect format only), the Certificate of No Objection, the underlying request for relief (with all exhibits), and the certificate of service. Upon receipt of the

foregoing, the Court may grant the relief requested in the Pleading without further submission, hearing or request.”

4. Local Rule 9075-2 provides that a motion or application may be granted without hearing if (a) no objections or responsive pleadings have been filed or served before 48 hours after the relevant objection deadline, and (b) the attorney for the entity that filed the pleading complies with the relevant procedural and notice requirements.

5. In accordance with the Case Management Order, responses to the Motion were due no later than March 8, 2023 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”).

6. As of the filing of this certificate, to the best of my knowledge, no responsive pleadings to the Motion, have been (a) filed with the Court on the docket of the above-captioned chapter 11 cases or (b) served on the Committee or their proposed counsel. Accordingly, the Committee respectfully requests entry of the Revised Proposed Order attached hereto as **Exhibit A** (the “**Revised Proposed Order**”), be entered in accordance with the Case Management Order and Local Rule 9075-2. A redline comparison of the Proposed Order and the Revised Proposed Order is attached hereto as **Exhibit B**.

7. The modifications reflected in the Revised Proposed Order incorporate certain revisions requested by the U.S. Trustee, as well as certain conforming and non-substantial changes.

8. I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: March 14, 2023  
New York, New York

*/s/ J. Christopher Shore*

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